

Exhibit 54

SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS

Case No.: 4:22-md-03047-YGR
MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Declaration of Julie Shivanonda

1. My name is Julie Shivanonda, and I make this declaration based on my personal knowledge.

2. I received a bachelor's degree in elementary education in 2004 from Northern Arizona University, a masters in elementary education from Northern Arizona University in 2005, and a master's degree in educational administration in 2013 from Grand Canyon University.

3. I have 21 years of experience working in K-12 education.

4. I have been the Director of Social Emotional Learning & Development at Tucson Unified School District ("TUSD") since September 2021 and have worked within TUSD since 2012 with the exception of about fifteen months in 2020-2021. Before being the Director Social Emotional Learning & Development, I was also an MTSS facilitator and coordinator at TUSD.

5. In my position as Director of Social Emotional Learning & Development, I oversee the implementation and coordination of programs and support that promote students' mental health, emotional regulation, positive behavior, and overall well-being. A significant portion of my responsibilities include addressing the growing impact of social media use among students, such as managing school/classroom disruptions, developing interventions to address cyberbullying, and overseeing staff who provide mental health counseling and behavior support, and collaborating with site leaders to implement prevention and education initiatives targeting digital wellness.

6. School Counselors follow the American School Counselor Association model for School Counseling, which means 80% of their work is providing direct services to students. Counselors track their time through internal reporting systems and report overall time spent on activities once per semester to the district Counseling department.

7. Currently, addressing the effects of social media on TUSD is one of the biggest challenges we address as a district. Nearly every student who we support through the counseling offices at schools, through the multi-tiered systems over support for attendance, behavior, or SEL needs, or for substance misuse is dealing with an issue related to social media. Accordingly, a substantial amount of my work time, and the work time of my colleagues and the school counselors and substance abuse community health workers that we oversee and work with, is spent addressing the fallout of social media's negative impact on students and the district.

8. In my experience, I have seen a growing problem of addictive, compulsive and problematic social media use among our students. We face a constant battle in separating students from their phones as students are unable to regulate or control their use of social media. Both parents and students report sleep deprivation amongst students in our school district due to excessive social media use and many students report suffering from physical effects, such as eye strain and headaches, caused by prolonged screen exposure.

9. I have also observed an alarming rise in student anxiety and depression which I believe is tied to social media. For example, since approximately 2016-17, I have seen a steady increase in students expressing feelings of worthlessness, loneliness, and peer comparison, particularly due to content on platforms like Instagram, Snapchat, and TikTok. This trend escalated significantly during and after the COVID-19 pandemic, when students' screen time surged and virtual interactions replaced many real-life connections. Today, many students report experiencing persistent anxiety linked to online validation, fear of missing out (FOMO), and online harassment. The frequency and severity of these mental health concerns are markedly higher than before the widespread use of social media.

10. Ultimately, there are numerous negative effects from students' personal use of social media that I and school counselors, school safety officers, behavioral interventionists, and teachers in our school district must address. These effects include, but are not limited to, excessive use of social media which impacts student's mental health and emotional wellbeing as described above, negative impacts on school performance, students use of fake social media accounts which expose children to dangerous situations on social media, and/or bullying and harassment that occurs on social media platforms and spills over into the school environment.

11. Importantly, I have observed that the impacts of social media on students' wellbeing are unique to social media use. For instance, I have observed that many students experience negative mental health impacts directly tied to their use of social media, such as depression and depressive symptoms, anxiety, suicidal ideations, self-harm, threats of violence, increased aggression, sleep disturbances, body dissatisfaction and eating disorder. I have not observed similar effects from students' use of cell phones generally, e.g., texting.

12. Similarly, bullying and harassment that occurs on social media platforms exacerbate the issues I and the school counselors and substance misuse community health workers I oversee and work with must address, as the bullying and harassment are disseminated further and for longer periods of time than they would be absent a social media platform and social media emboldens students to engage in this type of behavior that does not occur when interacting in person.

13. For instance, students have created anonymous "fight pages" on platforms like Instagram and TikTok, where they post and share videos of school fights or encourage students to physically confront one another. These pages often include school names or logos, causing reputational harm and creating a hostile environment. We have had to intervene, contact platform

moderators, and involve law enforcement in some cases to address these threats to student safety. Other types of pages include pages like “schoolname hotties” where students post pictures of other students and then any other students can “vote” on who is attractive or not. This creates an unsafe environment in our schools and creates opportunities for sexual harassment which also leads to body dissatisfaction and eating disorders, especially in female students.

14. We have also seen students engaging in dangerous social media challenges during the school day, such as the “Devious Lick” challenge, which encouraged students to vandalize or steal school property and post their actions online. These challenges have caused significant disruption, property damage, and safety concerns, requiring immediate intervention by school staff and administration. Outside of the direct property damage, this creates difficulties in the learning environment where students want to “see” and talk about the destruction. During Tik Tok challenges, students are even more connected to their phones as they are waiting to see their likes and views to the videos they post, thus creating an environment not conducive to learning. Based on my experience, kids are often engaging in these types of behaviors because they want increased social media followers, likes, comments, and other affirmation provided by the social media platform features.

15. These numerous negative effects from students’ personal use of social media cause many issues that I must address as Director of Social Emotional Learning & Development and that the coordinators, school counselors, and community health workers I oversee and work with must address. For example, classroom disruptions and aggressive behaviors— students are so connected to their phones that they are unable to put them away during instruction which disrupts the learning environment, and when asked to put the phones away, they become combative and disrespectful to the teachers, often needing to be sent out of class which leads to reduction in instruction time

for those students. School counselors and other support staff spend the majority of their time addressing the behaviors connected to cell phone and social media usage. With the increasing mental health issues our schools are seeing, counselors are inundated with students needing to talk, needing specific behavioral interventions or resources, or referrals to outside agencies for further mental and behavioral health concerns. The amount of time counselors are dealing with social media has significantly increased over the last several years. Counselors conduct restorative conversations with students involved, investigating the incidences and threats of aggression, and collaborating with other support staff to monitor and adjust the programming for students. High School Counselors are seeing an increased need for academic planning as students are failing classes due to the disruptions from social media and cell phone usage.

16. The time that I and the coordinators, school counselors, and community health workers I oversee and work with must spend on social media related impacts on students has substantially increased in the time that I have worked at TUSD.

17. I have a strong basis for estimating the time spent on social media-related concerns because I regularly meet with school counselors, community health workers, and MTSS teams to discuss caseloads and current student needs. We review monthly behavior and mental health data, discuss student support plans, and conduct districtwide professional development and collaborative sessions where emerging trends, including social media impacts, are thoroughly discussed.

18. Based on my experience as Director of Social Emotional Learning & Development, and MTSS facilitator and coordinator before that, going back to the 2016-17 school year, I believe that approximately 50% of time spent by Specialist Counselors, Counselors, and Counseling Interns, and Restorative Practice Facilitators was spent on social media related concerns and

addressing the impacts of students' personal social media use. Going back to the 2016-17 school year, I believe that about 75% of time spent by Behavior Specialists and Behavior Intervention Monitors; and 100% myself as SEL Director, and my SEL Program Coordinator was spent on social media related concerns and addressing the impacts of students' personal social media use and mental and social emotional health. Going back to 2016, I believe that approximately 40% of time spent by MTSS Coordinators and Facilitators was spent on social media related concerns and addressing the impacts of students' personal social media use.

19. Because of the percentage of time that I and the school counselors, behavior specialists, and MTSS staff I oversee and work with spend on addressing social media impacts on students, this means we have less time to dedicate to other aspects of our jobs. For example, concerns such as housing insecurity, food access, and other socio-economic barriers used to occupy a larger portion of our attention but are now harder to fully address because of the overwhelming need to manage social media-related issues. We often have to run group sessions instead of offering one-on-one support due to high demand, and we are increasingly pulled into emergency risk assessments—many triggered by social media threats or crises—which results in cancelled appointments and diverted resources. In some classrooms, curriculum time has been reduced or modified due to the need for increased supervision and behavioral redirection connected to online behavior fallout.

20. Moreover, while having additional staff would be helpful in addressing the negative impacts that the rising use of social media by students has had on students and the district, TUSD has not been able to increase hiring commensurate with the needs of the student population that has been negatively impacted by social media due to funding constraints.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
May 13, 2025.

Julie Shivanonda